

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

<div style="border-bottom: 1px solid black; padding-bottom: 5px;">In re: Blue Ridge Arsenal, Inc., Debtor.</div>)))))	Case No. 18-10472-KHK Chapter 11
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**NOTICE OF MOTION MOTION TO APPROVE SALE OF ASSETS FREE AND CLEAR
OF ALL LIENS, CLAIMS ENCUMBRANCES AND INTERESTS**

Blue Ridge Arsenal, Inc. (“Debtor”), the Debtor and Debtor-In-Possession herein, by and through the undersigned counsel, has filed papers (specifically that certain *Motion to Approve Sale of Assets Free and Clear of All Liens, Claims, Encumbrances and Interests* (the “Motion”)) requesting the entry of an Order (i) approving the terms and conditions of that certain *Agreement of Sale and Purchase* (the “Sale Agreement”) by and between, *inter alia*, the Debtor, as seller, and Blackfish Armory, LLC (“Blackfish”), a Virginia limited liability company and a secured creditor holding senior lien on all assets of the Debtor, as purchaser, providing for the sale of substantially all of the Debtor’s assets in exchange for payment of the sum of \$600,000 through crediting of the current amount owed to Blackfish as a secured creditor (\$600,000), and by payment of the sum of \$25,000 in cash, as more particularly described in the Motion, and (ii) authorizing the sale of said property to Blackfish, free and clear of all liens, claims, encumbrances, and interests, including the liens, claims, encumbrances and interests of certain creditors more particularly described in the Motion. A copy of the *Motion*, with Exhibit and a proposed *Order*, is being served on all known lien creditors and is available to any other party upon written request to the undersigned counsel. Regardless, all pleadings and exhibits have been filed with the Court and are available for review through the Bankruptcy Court’s website at <https://www.vaeb.uscourts.gov>.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the *Motion*, or if you want the court to consider your views on the *Motion*, then you or your attorney must:

- ◇ **On or before 5:00 p.m. on February 5, 2019 (the “Response Deadline”)** file with the Court, at the following address, Clerk of Court, United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 South Washington Street, Alexandria, Virginia 22314, a written response with supporting Memorandum, as required by Local Rule 9013-1(H). **Unless a written response and memorandum is filed and served by the Response Deadline, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date noted above. You must also mail a copy to the persons listed below.

◇ **Send a copy of any written response to the following persons:**

Robert M. Marino, Esq.
Redmon Peyton & Braswell LLP
510 King Street, Suite 301
Alexandria, Virginia 22314

The Office of the United States Trustee, Region 4
115 South Union Street, Suite 210
Alexandria, VA 22314

◇ **Attend a hearing presently scheduled for Tuesday, February 12, 2019, at 11:00 A.M.,** before the Honorable Klinette H. Kindred, United States Bankruptcy Judge, Courtroom II, Second Floor, 200 South Washington Street, Alexandria, Virginia 22314.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the *Motion* and may enter an order granting that relief.

Dated: January 4, 2019

Respectfully Submitted,

/s/ Robert M. Marino
Robert M. Marino, Esq. VSB#26076
REDMON, PEYTON & BRASWELL, LLP
510 King Street, Suite 301
Alexandria, VA 22314
Phone: 703-684-2000
Fax: 703-684-5109
Email: rmmarino@rpb-law.com
Counsel for Blue Ridge Arsenal, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of January, 2019, caused a copy of the foregoing *Notice* to be served electronically through the electronic case filing system to all persons entering their appearance and requesting notice in this case, and by first class mail, postage prepaid, to all persons on the attached mailing matrix. And by certified mail to the following persons believed to hold liens of record on the subject Assets:

Sandy Spring Bank
c/o CT Corporation System
4701 Cox Road, Suite 285
Glen Allen VA 23060

Sandy Spring Bancorp, Inc.
17801 Georgia Avenue
Olney, MD 20832
Attn: Ronald E. Kuykendall, Executive Vice President, General Counsel and Secretary

American Express National Bank f/k/a American Express Bank, FSB
Attn: Lauren E. Seeger, Executive Vice President and General Counsel
4315 South 2700 West
Salt Lake City, UT 84184

Wells Fargo Financial Leasing, Inc.
c/o Corporation Service Company
100 Shockoe Slip, 2nd Floor
Richmond, VA 23219

Wells Fargo Financial Leasing, Inc.
800 Walnut Street
Des Moines, IA 50309
Attn: C. Allen Parker, Senior Executive Vice President and General Counsel

Monroe Capital Management Advisors, LLC
311 South Wacker Drive
64th Floor
Chicago, IL 60606
Attn: Peter Gruszka, General Counsel and Managing Director

Channel Partners Capital, LLC
11100 Wayzata Blvd., Suite 305
Minnetonka, MN 55305
Attn: Brad Peterson, CEO

CT Corporation System, as Representative
330 N. Brand Blvd., Suite 700
Glendale, CA 91203
Attn: SPRS

/s/ Robert M. Marino
Robert M. Marino